

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO
BE PERMITTED TO TRAVEL OUT OF STATE AND TO DELETE CONDITION
REGARDING ELECTRONIC MONITORING**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to travel out of the state of Arizona from January 6, 2006 to January 23, 2006. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.
2. Mr. Reid and undersigned counsel were before this Honorable Court on January 5, 2006 at 10:00 a.m. for oral argument on his *Motion to Modify Conditions of Release*. undersigned counsel advised the Court that Mr. Reid was planning on traveling to Oregon from January 6, 2006 for two weeks in order to care for his daughter who was recently involved in an automobile accident.

3. At that time, Assistant United States Attorney James Braun stated on the record that he had no objection to Mr. Reid traveling to Oregon on the dates specified above.

4. Mr. Reid has contacted his assigned Pre-trial Services Agency Officer in Arizona, Jose Valencia, and Mr. Valencia stated that he has no objection to Mr. Reid's travel plans.

5. This Honorable Court, for all intents and purposes, granted Mr. Reid's oral motion to travel and requested that undersigned counsel file a formal motion and proposed form of order for the Court's signature.

6. Additionally, at the conclusion of the Hearing, the Court deleted the term which required Mr. Reid to participate in the electronic monitoring program.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to travel to Oregon from January 6, 2006 to January 23, 2005 and deleting the term requiring him to participate in the electronic monitoring program.

RESPECTFULLY SUBMITTED this 6th day of January, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
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I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 6th day of January, 2006.

/s/ electronically signed

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